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22 **UNITED STATES DISTRICT COURT**  
23 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

24 STEVEN COHEN on behalf of himself  
25 and all others similarly situated,

26 CASE NO. 2:23-cv-7679

27 Plaintiff,

**CLASS ACTION**

28 v.

**NOTICE OF RELATED CASE**

29 EP GLOBAL PRODUCTION  
30 SOLUTIONS, LLC d/b/a  
31 ENTERTAINMENT PARTNERS,

32 Defendant

1 Pursuant to Local Rule 83-1.3.1, Plaintiff in the above-captioned matter  
2 (“*Cohen*”) hereby provide notice of the following related cases currently pending in  
3 the Central District of California:

4 *Brenden Smith v. Entertainment Partners, LLC, et al.*, No. 2:23-cv-06546-  
5 CAS-PVC (“*Smith*”);

6 *Darnisha Goff v. Entertainment Partners, LLC*, No. 2:23-cv-06575-CAS-PVC  
7 (“*Goff*”);

8 *William Rhumm. v. EP Global Production Solutions, LLC, et al.*, No. 2:23-cv-  
9 06713-CAS-PVC (“*Rhumm*”);

10 *Alexis Murphy v. Entertainment Partners, LLC*, No. 2:23-cv-06714-CAS-PVC  
11 (“*Murphy*”);

12 *Antionette Staniewicz v. Entertainment Partners, LLC*, No. 2:23-cv-06731-  
13 CAS-PVC (“*Staniewicz*”);

14 *Hopelyn Ferguson v. EP Global Production Solutions, LLC*, No. 2:23-cv-  
15 06732-CAS-PVC (“*Ferguson*”);

16 *Aimee Levi v. Entertainment Partners, LLC, et al.*, No. 2:23-cv-06781-  
17 CAS(PVCx) (“*Levi*”);

18 *Janet Dyer v. Entertainment Partners, LLC, et al.*, No. 2:23-cv-06821-WLH-  
19 SSC (“*Dyer*”);

20 *Victoria Minnich v. EP Global Production Solutions, LLC*, No. 5:23-cv-01696-  
21 SSS-SHK (“*Minnich*”); and

22 *Replogle v. EP Global Productions Solutions, LLC*, No. 2:23-cv-06941-JLS-  
23 JC (“*Replogle*”)

24  
25 Civil Local Rule 83-1.3.1 states that actions are related when they appear, *inter*  
26 *alia*:

27 (a) To arise from the same or a closely related transaction, happening or  
28 event; or

3 (c) For other reasons would entail substantial duplication of labor if heard  
4 by different judges.

5 The above cases arise from the same transactions, happenings, and events as  
6 the *Cohen* case. The cases also call for determination of the same or substantially  
7 similar questions of law and fact. The cases involve a common defendant and arise  
8 from the same or substantially similar series of facts. They all allege that Defendant  
9 failed to properly secure and safeguard highly valuable, protected personally  
10 identifiable information, including names, Social Security numbers and/or tax  
11 identification numbers, and mailing addresses. They all allege that Defendant failed  
12 to provide adequate notice to Plaintiff and similarly situated class members. The cases  
13 present virtually identical questions of law and fact relating to Defendant's knowledge  
14 of the conduct.

15 Relating (and consolidating) all of the cases would avoid the duplication of  
16 labor, unnecessary costs, and the risk of conflicting results. It would also promote the  
17 just and efficient conduct of the cases. Accordingly, Plaintiff respectfully submit that  
18 the *Smith, Goff, Rhumm, Murphy, Staniewicz, Ferguson, Levi, Dyer, Minnich and*  
19 *Replogle* cases should be related to, and consolidated with, the *Cohen* case.

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1 DATED: September 14, 2023 **PEARSON WARSHAW, LLP**  
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5 By: /s/ Daniel L. Warshaw  
6  
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